

**From:** [Westen, Jacob](#)  
**To:** [Covington, Jeryl](#); [Buntin, Dru](#)  
**Cc:** [Wilson, Adam](#); [Goldstein, Ivery](#)  
**Subject:** RE: EPA Complaint Number 01RNO-20-R7: Request for Website Posting of the MoDNR Voluntary Compliance Agreement  
**Date:** Friday, July 15, 2022 5:00:22 PM  
**Attachments:** [MoDNR Four Factor Analysis July 2022.pdf](#)

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Good afternoon!

Apologies for the delay on the delivery of this analysis document. We were building this into our draft LEP forthcoming next Friday, and I missed this particular date.

Please let me know if you have any questions. Have a good weekend!

Jacob

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**From:** Covington, Jeryl <[Covington.Jeryl@epa.gov](mailto:Covington.Jeryl@epa.gov)>  
**Sent:** Thursday, July 14, 2022 1:31 PM  
**To:** Buntin, Dru <[Dru.Buntin@dnr.mo.gov](mailto:Dru.Buntin@dnr.mo.gov)>; Westen, Jacob <[Jacob.Westen@dnr.mo.gov](mailto:Jacob.Westen@dnr.mo.gov)>  
**Cc:** Wilson, Adam <[wilson.adam@epa.gov](mailto:wilson.adam@epa.gov)>; Goldstein, Ivery <[Goldstein.Ivery@epa.gov](mailto:Goldstein.Ivery@epa.gov)>  
**Subject:** EPA Complaint Number 01RNO-20-R7: Request for Website Posting of the MoDNR Voluntary Compliance Agreement

On June 22, 2022, the U.S. Environmental Protection Agency's Office of General Counsel's External Civil Right Compliance Office (ECRCO) issued a Voluntary Compliance Agreement (VCA) for administrative complaint number 01RNO-20-R7 involving the Missouri Department of Natural Resources (MoDNR) (attached).

As documented in Section III.C.1.A, of the VCA, MoDNR is to conduct an appropriate "Four Factor" analysis as described in EPA's LEP Guidance to identify the appropriate language groups in the State of Missouri. Within 15 days of the effective date of the VCA, MoDNR was to confirm that it has conducted this analysis.

Please confirm whether MoDNR has fulfilled this commitment by July 7, 2022. If additional time is needed, please submit a request for additional time to ECRCO.

If you have any questions, please do not hesitate to contact our office.

Jeryl W. Covington  
Environmental Protection Specialist

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